

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION**

**TYLER KLINGENSMITH**

**PLAINTIFF**

**VS.**

**NO. 19-5185**

**DEPUTY ADRIAN CRUZ,  
ROBIN HOLT, JOSEPH ALLEN,  
MEGAN RUTLEDGE, NICHOLAS  
GUERRERO, RANDALL McELROY,  
SGT. JOE ADAMS, ANTHONY COBB,  
SGT. BRADY, SGT. COGDILL, BENTON COUNTY,  
et al.**

**DEFENDANTS**

**BENTON COUNTY DEFENDANTS’  
MOTION FOR SANCTIONS**

Comes now the Benton County Defendants and the undersigned counsel, and for their Motion for Sanctions, do state the following:

1. On September 13, 2021, the undersigned received from Plaintiff correspondence containing harassing and outrageous communications, Exhibit No. A (filed under seal).
2. The communication constitutes criminal conduct under Arkansas law, Ark. Code. Ann. §5-71-209 Harassing Communications, in that it was a written communication by mail, sent with the purpose to harass, annoy, or alarm another person, namely the undersigned. Harassing Communications is a Class A Misdemeanor.
3. Plaintiff has bombarded the Court and the parties with irrelevant and vexatious “pleadings” throughout this matter, leading the Court to strike certain pleadings and refuse to file others. However, his latest tactic rises to a different level of disregard for the judicial process and human dignity.
4. For this conduct, Defendants respectfully request that the Court issue an order

issuing sanctions against Plaintiff, up to and including monetary sanctions, deemed admission of Defendants' Statement of Indisputable Material Facts, and/or dismissal of his claim herein.

5. Should the matter proceed, Defendants respectfully request an order requiring all correspondence from Plaintiff be directed through the Court and that Plaintiff attempt no further contact with the undersigned by any means and for any purpose.

WHEREFORE, the Defendants respectfully request that sanctions be imposed upon the Plaintiff, for an order of no contact, and for any other just and proper relief to which they are entitled.

Respectfully submitted,

DEPUTY ADRIAN CRUZ, DEPUTY JOSEPH ALLEN, MEGAN RUTLEDGE, NICHOLAS GUERRERO, SGT. JOE ADAMS, DEPUTY AUSTON COBB, SGT. TREY BRADY, SGT. KENNETH COGDILL, AND SHERIFF HOLLOWAY, et al., Defendants

JaNan Arnold Thomas  
Bar No. 97043  
Attorney for Defendants  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2021, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system, and I mailed the document by United States Postal Service to the following non-CM/ECF participant:

Mr. Tyler Klingensmith  
ADC #170977  
North Central Unit  
10 Prison Circle  
Calico Rock, AR 72519

I hereby certify that on September 15, 2021, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system which shall send notice to the following CM/ECF participant:

Sara Monaghan (for Defendant Detective Jordan)  
P.O. Box 38  
N. Little Rock, AR 72115  
[smonaghan@arml.org](mailto:smonaghan@arml.org)

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JaNan Arnold Thomas  
JaNan Arnold Thomas, #97043  
Attorney for Defendants